

Kim Robert Scovill, Esq.

Vice President & Assistant Secretary, Safety & Security Technologies Comtech Telecommunications Corp. (Parent Company of TeleCommunication Systems, Inc.)

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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Wireless E911 Location Accuracy Requirements - GN Docket No. 11-117; In the Matters of IP-Enabled Services E911 Requirements for IP-Enabled Service Providers - WC Docket No. 05-196; In the Matter of Facilitating the deployment of Text-to-911 and other NG911 applications. Framework for Next Generation 911 deployment - PS Docket No. 11-153; and In the Matter of Framework for Next Generation 911 Deployment - PS Docket No. 10-255

Dear Ms. Dortch:

TeleCommunication Systems, Inc. hereby withdraws its Petition for Declaratory Ruling and Rulemaking¹ in the above-styled dockets ("Petition").² The Petition seeks various remedies from the Federal Communications Commission regarding predatory patent infringement actions targeting providers of vital public safety, 9-1-1, and/or Next Generation 9-1-1 systems or services.

Recent actions by the Federal Courts and the Supreme Court of the United States related to intellectual property litigation have, in general and for the time being, rendered it more difficult for so called "patent trolls" to file infringement actions. This change in the litigation environment has lessened the velocity of troll-like cases in the public safety space.

Should you have any questions or require further information regarding this matter, please contact the undersigned.

Respectfully submitted,

/s/ Kim Robert Scovill

Kim Robert Scovill, Esq. Vice President, Legal, Regulatory, and Government Affairs, and Assistant Secretary

cc: Timothy May, PSHSB

¹ Petition of Telecommunication Systems Inc. for Declaratory Ruling and/or Rulemaking, GN Docket No. 11-117, WC Docket No. 05-196, PS Docket No. 11-153, PS Docket No. 10-255 (filed July 24, 2012).

² This withdrawal is voluntary and, therefore, TeleCommunication Systems, Inc. reserves all rights to refile the Petition or any other related action at any time.